

EXHIBIT A-2

From: Rita Glavin <rglavin@glavinpllc.com>
Sent: Thursday, June 3, 2021 3:31 PM
To: Garbus, Martin
Cc: Lynch, Timothy; Offit, Theodore A.
Subject: RE: US v. Donziger: Mr. Garbus's 6.3.21 letter

Mr. Garbus,

Once again, you are an officer of the court and you have an obligation to ensure the accuracy of any assertions you make in your public filings. It is not my responsibility to point out all of your inaccuracies. I previously had this discussion with you in connection with a previous filing you made that contained inaccurate information and personal attacks.

That said, I will give you two examples of false information in your letter. First, I was not "previously criticized by a federal appeals court in the Senator Stevens case for withholding information critical to the defense." Second, this is not a "Chevron-financed prosecution"—as you well know—and it is inaccurate to state that "[t]he proof has also shown the vast amount of money that Chevron has spent on this prosecution."

Those examples should cause you to consider sourcing every single statement you make in your letter.

Finally, I am not a "Chevron" prosecutor.

Rita Glavin

From: Garbus, Martin <mgarbus@offitkurman.com>
Sent: Thursday, June 3, 2021 3:09 PM
To: Rita Glavin <rglavin@glavinpllc.com>
Cc: Lynch, Timothy <tlynch@offitkurman.com>; Offit, Theodore A. <Theodore.Offit@offitkurman.com>
Subject: Re: US v. Donziger: Mr. Garbus's 6.3.21 letter

Dear Ms Glavin

If you believe any single or multiple facts, or interpretation or law, as in the Stevens case, is wrong, let me know and I will immediately correct it. If you oppose or disagree with any word, sentence, fact, or opinion I made, let me know and I will immediately correct it.

Martin Garbus

Martin Garbus

Principal
D [347.589.8513](tel:347.589.8513)
mgarbus@offitkurman.com



590 Madison Ave.
6th Floor
New York, NY 10022
T [212.545.1900](tel:212.545.1900)
F [212.545.1656](tel:212.545.1656)
offitkurman.com



Offit | Kurman
Attorneys At Law

From: Rita Glavin <rglavin@glavinpllc.com>

Sent: Thursday, June 3, 2021 2:51 PM

To: Garbus, Martin

Cc: Ron Kuby (ronaldkuby@gmail.com); rhiyatrivedi@gmail.com; Brian Maloney - Seward & Kissel LLP (maloney@sewkis.com); Sareen Armani

Subject: Re: US v. Donziger: Mr. Garbus's 6.3.21 letter

Mr. Garbus,

You are an officer of the court, and you have an obligation to do due diligence on the accuracy of any assertions you make in court filings. It is not my responsibility to point out the false statements in your submission. I urge you to review your filing, and source every statement that you made.

I intend to submit my email correspondence with you, and your June 3, 2021 letter to the managing partner of your firm.

Respectfully,
Rita Glavin

Rita M. Glavin

Glavin PLLC

[2585 Broadway #211](#)

[New York, NY 10025](#)

tel: [\(646\) 693-5505](tel:(646)693-5505)

rglavin@glavinpllc.com

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From: Garbus, Martin <mgarbus@offitkurman.com>

Sent: Thursday, June 3, 2021 2:36:10 PM

To: Rita Glavin <rglavin@glavinpllc.com>

Subject: Re: US v. Donziger: Mr. Garbus's 6.3.21 letter

Dear Ms Glavin

I apologize for any inaccuracy .

If you will advise me of it, I will correct whatever was wrongly said

Respectfully

Martin Garbus



Martin Garbus

Principal

D [347.589.8513](tel:347.589.8513)

mgarbus@offitkurman.com



590 Madison Ave.

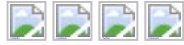
6th Floor

New York, NY 10022

T [212.545.1900](tel:212.545.1900)

F [212.545.1656](tel:212.545.1656)

offitkurman.com



On Jun 3, 2021, at 1:59 PM, Rita Glavin <rglavin@glavinpllc.com> wrote:

Mr. Garbus,

Your June 3, 2021 letter filed on the docket (attached) contains inaccurate information and personal attacks. I feel compelled to remind you of Rule 3.3 and Rule 4.1 of the New York Rules of Professional Conduct.

Rule 3.3(a)(1) provides in pertinent part: "A lawyer shall not knowingly . . . make a false statement of fact or law to a tribunal or fail to correct a false statement of material fact or law previously made to the tribunal by the lawyer."

Rule 3.3(f)(2) provides: "In appearing as a lawyer before a tribunal, a lawyer shall not. . . engage in undignified or discourteous conduct."

Rule 4.1 provides: "In the course of representing a client, a lawyer shall not knowingly make a false statement of fact or law to a third person."

Respectfully,
Rita Glavin

Rita M. Glavin

Glavin PLLC

[2585 Broadway #211](#)

[New York, NY 10025](#)

tel: [\(646\) 693-5505](tel:646.693.5505)

rglavin@glavinpllc.com

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<ECF 324 (6.3.21 Garbus recusal rqst).pdf>

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